

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

No. 3:22-cv-00191-MOC-DCK

THE NORTH CAROLINA
DEPARTMENT OF ADULT
CORRECTION, *et al.*,

Defendants.

**PLAINTIFF'S RENEWED MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Pursuant to the Court's order of February 2, 2024 (Doc. 92 at 1), Plaintiff respectfully renews her motion for partial summary judgment (Doc. 62). Specifically, Plaintiff asks the Court to (1) grant her summary judgment on her Eighth Amendment and ADA claims; (2) enter a permanent injunction requiring Defendants to immediately arrange for Plaintiff to undergo gender-affirming surgery and all other necessary care as prescribed by her treating clinicians at UNC Hospital; and (3) grant Plaintiff summary judgment as to Defendants' liability for damages under Article I, Section 27 of the North Carolina Constitution.

Respectfully submitted this 29th day of February, 2024.

/s/ Daniel K. Siegel

Jaclyn A. Maffetore

NC Bar No. 50849

Daniel K. Siegel

NC Bar No. 46397

Michele Delgado
NC Bar No. 50661
ACLU OF NORTH CAROLINA
LEGAL FOUNDATION
jmaffetore@acluofnc.org
dsiegel@acluofnc.org
mdelgado@acluofnc.org
919-592-4630

Christopher A. Brook
NC Bar No. 33838
PATTERSON HARKAVY LLP
cbrook@pathlaw.com

Jon W. Davidson*
(admitted only in California)
L. Nowlin-Sohl*
(admitted only in Washington)
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
jondavidson@aclu.org
lnowlin-sohl@aclu.org

*admitted *pro hac vice*

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on February 29, 2024, I electronically filed the foregoing document using the ECF system which will send notification of such filing to all counsel of record.

/s/ Daniel K. Siegel
Daniel K. Siegel

Counsel for Plaintiff